

Dear FCC commissioners,

I am a Deaf VRS user and am very grateful for how VRS has significantly increased access to our country's telecommunications networks for Deaf/HoH Americans.

However, in reading many of the comments, notices, and other documents under proceeding 03-123 along with my own personal experiences in using VRS, it is clear to me that there are several issues and problems that keep our country's telecom system from being equally accessible for many Deaf Americans as it is for virtually all other Americans with normal hearing. Such issues and problems are:

\* **LACK OF BROADBAND ACCESS:** VRS, as a data-intensive application, requires a potential user to have residential broadband with low-ping time available at the home. The FCC needs to find ways to incentivize broadband service providers to extend the reach of low-ping broadband access to all Americans, particularly in rural areas.

\* **DATED TECHNOLOGY:** Current VRS providers rely on H.323-enabled videophones to facilitate their services. Unfortunately, the dialing methods required for both Deaf and hearing people to use the services through such types of devices can frequently be burdensome, unreliable, and awkward. I am aware that the FCC has requested comments on how to address this problem.

\* **UNINTENDED EFFECTS OF THE INTEROPERABILITY RULING:** The irony of the interoperability ruling in May 2006 has prevented one VRS provider, SnapVRS (i.e., Snap Communications) from being able to offer a SIP-based videophone (the Motorola OJO) which promises to resolve many of the issues that currently plague H.323 devices. It allows normal dialing methods to be used, video messages can be left, and probably most significantly, it uses the H.264 video standard which permits high video quality over a relatively low broadband connection (as low as 150 kbps connection).

As a Deaf consumer, I fully appreciate the intent of the interoperability ruling, but am disappointed that I don't have a choice to use such a "next-generation" type of videophone technology like the OJO that is available today, but is, for all intents and purposes "illegal" for VRS usage. I've seen SnapVRS's requests for a waiver, and was hoping that the FCC would grant it so that I could use BOTH the OJO and the Sorenson VP-100 that I currently have, since they can both cohabitate on the same network, which is not true for two H.323 enabled videophones (i.e, the VP-100 used to access the Sorenson service and the D-link 1000 used to access all other providers).

\* LACK OF R&D INCENTIVIZATION: I can also see from comments from various VRS providers that the current reimbursement structure and processes are not conducive to incentivizing future videophone technology development. I work in the federal government in the procurement arena and am very aware of the importance of effectively incentivizing contractors with an appropriate profit rate along with paying them for some of their own R&D efforts that end up benefiting the government. It's no different for the current VRS providers. I don't doubt that they are interested in moving up to videophone technologies offered by the OJO videophone, but if they have no reasonable assurance of being able to recoup the R&D costs of moving to a different, more effective videophone platform, then how can we expect technological improvements to proceed in our market-based economy?

As a Deaf American VRS consumer, it is my hope that the FCC will address the aforementioned issues by:

- 1) Incentivizing broadband providers to extend their services to rural areas;
- 2) Incentivizing VRS providers to consider and implement videophone technologies that will make VRS ever closer to the "comparable and functionally-equivalent" standard; and
- 3) Modifying the interoperability ruling to allow VRS providers to offer alternative videophone which are able to cohabitate on the same network with a H.323 device, to allow them to differentiate themselves from other VRS providers much like cellular service providers do, and thus spur on the competitive spirit that is the foundation of our American economy.